



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D C 20463

Marc Elias  
Kate Sawyer Keane  
Perkins Coie  
607 Fourteenth Street, NW  
Washington, DC 20005

**AUG 17 2010**

**RE MUR 6215 (Friends for Harry Reid and  
Claude Zobell, in his official capacity as  
Treasurer)**

**Dear Mr Elias and Ms Keane**

The Federal Election Commission ("Commission"), the regulatory agency that administers and enforces the Federal Election Campaign Act of 1971, as amended ("the Act"), has ascertained information in the normal course of carrying out its supervisory responsibilities indicating that Friends for Harry Reid and Claude Zobell, in his official capacity as Treasurer ("Reid Committee"), may have violated 2 U S C § 441b, which prohibits knowing acceptance or receipt of corporate contributions

On October 2 and November 6, 2009, we notified your clients of a complaint and supplemental complaint filed in the above-referenced matter, and we received your response on December 3, 2009. The complaint alleged reimbursement of contributions made in connection with a fundraising luncheon hosted by Tate Snyder Kimsey Architects ("TSKA") on February 17, 2009, and attached a copy of the fundraising invitation stating, "Tate Snyder Kimsey invites you to a luncheon honoring Senator Harry Reid. Please RSVP to Peggy Memering at 702 456 3000 or pmemering@tatesnyderkimsey.com by February 9, 2009." Information in the Commission's possession suggests that TSKA used corporate resources to produce these invitations, oversee the guest list for the fundraiser, arrange for a photographer, and work with the catering vendor, Wolfgang Puck Café in Las Vegas, and that Reid Committee staff Christopher Anderson and Megan Jones affirmatively requested that TSKA personnel solicit individuals not within the restricted class and assist in collecting outstanding contributions. In addition, the Commission has information that the Reid Committee agreed to reimburse TSKA for the \$1,615.39 in catering costs rather than making an advance payment and failed to pay the costs associated with the fundraising invitations. As a result of these actions, the Reid Committee may have knowingly accepted prohibited corporate contributions. See 2 U S C § 441b(a), *see also* 11 C F R § 114.2(f).

The Commission's Office of the General Counsel is reviewing this information in connection with making a recommendation to the Commission as to whether there is reason to believe that you violated the Act, an initial determination necessary to initiate an investigation into whether a violation has, in fact, occurred See 2 U S C § 437g(a)(2) Before the General Counsel makes such a recommendation, you may provide in writing any factual or legal materials that you believe are relevant to this matter, including any communications your clients may have had with TSKA regarding the February 2009 fundraiser Your submission, if you choose to make one, must be submitted within 15 days of receipt of this letter and addressed to the General Counsel's Office After 15 days, the General Counsel's Office will present its recommendations to the Commission Any response submitted by you will be taken into account in these recommendations

This matter will remain confidential in accordance with 2 U S C §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public

If you have any questions, please contact me at (202) 694-1650

Sincerely,



Roy Q Lockett  
Acting Assistant General Counsel